

RECEIPT # 56605
 AMOUNT \$ _____
 SUMMONS ISSUED _____
 LOCAL RULE 4.1 _____
 WAIVER FORM _____
 MCF ISSUED _____
 BY DPTY. CLK _____
 DATE BABSON COLLEGE

UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MASSACHUSETTS

FILED
 IN CLERK'S OFFICE

2004 JUN 15 P 2:16

UNITED STATES DISTRICT COURT
 DISTRICT OF MASS.

vs.

PAUL D. REYNOLDS

Defendant

and

JOHN AND JANE DOE(S)

Reach and

Apply Defendants

) Civil Action No.

04 - 11336 RCL

MAGISTRATE JUDGE Boulder

NOTICE OF REMOVAL

Pursuant to 28 U. S. C. §1441, defendant Paul D. Reynolds ("Reynolds") files this Notice of Removal and states:

1. Reynolds is the defendant in an action commenced against him by plaintiff in the Superior Court of the Commonwealth of Massachusetts for Suffolk County captioned Babson College v. Paul D. Reynolds and John and Jane Doe(s), Civil Action No. 04-2439-BLS2 (the "state action"). True copies of all process, pleadings and orders served on Reynolds in the state action are attached hereto as Exhibit A and specifically incorporated herein.

2. In its complaint, plaintiff Babson alleges that Reynolds's voluntary separation from Babson terminated his right to lawful possession of property, including confidential and proprietary information, relating to a certain Global Entrepreneurship Monitor (GEM) research project, that Reynolds possesses such property, and has thereby converted such property.